UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
V.)	Criminal No. 04-10028-RCI
)	
SANTINO HALL,)	
Defendant.)	

JOINT FINAL STATUS MEMORANDUM UNDER LOCAL RULE 116.5(C)

Pursuant to Local Rule 116.5(C), the parties hereby submit this Joint Final Memorandum to address issues relative to the progress of this case.

- 1. There are no anticipated discovery issues to be resolved by the Court.
- 2. Although the government has provided the defendant with all documents and discoverable materials in this case, the government may receive additional discoverable information, which it will promptly turn over to the defense.

Additionally, the defendant does not presently have any discoverable information, but pursuant to his agreement to provide reciprocal discovery, will provide the government with any such information received in the future.

- 3. The defendant does not plan to present a defense of insanity.
- 4. The defendant does not intend to offer a defense of alibi.
- 5. The defendant has not filed, and does not intend to file, any motion to sever, dismiss or suppress, or any other motion requiring a ruling by the District Court before trial.
- 6. It is anticipated that the defendant will change his plea and plead guilty to the charges alleged in the superseding indictment. As such, the parties do not believe any schedule needs to be set concerning any matter in the case other than a Rule 11 hearing, or in the alternative, a trial date.
- 7. There have been discussions regarding the possibility

- of an early resolution of the case without a trial. As noted above, it is anticipated that the defendant will change his plea and plead guilty to the charges alleged in the superseding indictment.
- 8. As of June 18, 2007, twenty-eight (28) non-excludable days will have occurred, leaving forty-two (42) days remaining under the Speedy Trial Act in which this case must be tried.
- 9. The parties estimate that if this case goes to trial, the trial will last a total of 3-4 days.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

SANTINO HALL, Defendant

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Dated: June 13, 2007